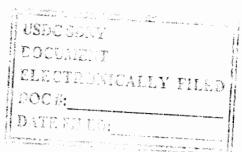
MEMO ENDORSE DE STATES DISTRICT COURT DE STATES DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

V. :

ANTHONY GRECCO



Case No.: 7:14-CR-00760-KMK-1

MOTION TO POSTPONE SENTENCING

Defendant, Anthony Grecco, by and through counsel, moves the Honorable Court to continue sentencing in this matter for a period of forty-five (45) days. As grounds, the Defense avers the following:

- 1. Mr. Grecco was convicted on January 22, 2016 with (1) Conspiracy to Commit Hobbs Act Robbery, in violation of 18 U.S.C. § 1951; (2) Aiding and Abetting a Hobbs Act Robbery, in violation of 18 U.S.C. § 1951; (3) Conspiracy to Distribute and Possess with Intent to Distribute Marijuana, in violation of 21 U.S.C. § 846 and 841(b)(1)(D); (4) Conspiracy to Distribute and Possess with Intent to Distribute Cocaine and Heroin, in violation of 21 U.S.C. § 846, and 841 (b)(1)(C); and (5) Aiding and Abetting a Travel Act Murder, in violation of 18 U.S.C. § 1952.
- 2. As a result of Mr. Grecco's convictions, he faces a potential sentence of life in prison.
- 3. Sentencing is currently scheduled for May 25, 2016.
- 4. The Defense counsel requires additional time to prepare for this event. The Defense retained a mitigation specialist to aid with sentencing preparation. Further, Mr. Grecco's potential sentencing witnesses are all located in Oregon, which has presented challenges with preparation.

5. Based upon the foregoing, Mr. Grecco asks that this motion be granted.

Respectfully submitted this 14th day of April 2016.

hat this motion be granted.

2016.

Respectfully submitted Defendant, Anthony Grecco By his Counsel

/s/ John L. Calcagni III, Esq.

John L. Calcagni III (Bar No.: JC5514) Law Office of John L. Calcagni III, Inc. One Custom House Street, Third Floor

Providence, RI 02903 Phone: (401) 351.5100 Fax: (401) 351.5101

Email: jc@calcagnilaw.com

CERTIFICATION

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered Participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as nonregistered participants on April 14, 2016.

/s/ John L. Calcagni III, Esq.

John L. Calcagni III (Bar No.: JC5514) Law Office of John L. Calcagni III, Inc. One Custom House Street, Third Floor

Providence, RI 02903 Phone: (401) 351.5100 Fax: (401) 351.5101

Email: jc@calcagnilaw.com

Motivi is granted. Sentence is adjourned to Suly 2, Zolb, at 2:00

So Ordered.

MIT

4/15/16

2